

• **NEIGHBORHOOD AND DEMOGRAPHIC CRITERIA**

As described in the Consolidated Plan for Fiscal Years 1998-2002, the City is currently undertaking a new "*Neighborhoods First*" initiative to focus its programs and services on neighborhood improvement. The City's non-housing community development strategy was expected to be similarly based on neighborhoods, concentrating on the physical improvements and services, which are needed in CDBG-eligible areas. The City was preparing a new housing and redevelopment strategy, called the "*Neighborhoods First*" initiative. This new plan will guide all redevelopment activities.

In order to encourage neighborhood revitalization, this long-term strategy has been developed for North Beach. A future neighborhood strategy is being contemplated for South Beach, in partnership with CDAC, MBCDC and the Lincoln Road for South Beach; and NBDC for North Beach, the Housing Authority of the City of Miami Beach, and other significant partners who serve low and moderate income populations.

The Plan's target area is generally known as North Beach. North Beach is the northernmost section of Miami Beach and encompasses the area of 63rd Street north to 87th Street and Biscayne Bay east to the Atlantic Ocean.

Demographically speaking, the population within this area is culturally diverse and predominantly poor. While there are pockets of affluence within the target zone, the majority of the area is poor, ethnically and culturally diverse (though predominantly Hispanic), and reside in multi-unit rental housing.

The City of Miami Beach has undergone significant population and economic changes in the past 15 years. The City has transitioned from a sleepy retirement community for the elderly dependent on seasonal tourism to a young, professional, culturally diverse community with a surging, diversified economy. Most of the City's schools are overcrowded because of the youth explosion that accompanied the rapid drop in median age. Biscayne Elementary, the only public school within the target area, was designed to accommodate 750 students and now accommodates more than 1,100 students.

While the City of Miami Beach is experiencing an economic upturn, the target area has not experienced the same economic windfall. The City's economic profile shows this disparity. The North Beach area has been identified as a low/moderate income target zone by the Department of Housing & Urban Development because of its economic profile.

The target area is comprised mostly of multi-unit rental housing. This fact, coupled with the area's high mobility (reflected in the mobility rates of students attending area schools), further complicates efforts to build community cohesion as it is difficult to establish stability and investment with a shifting population.

The northern target area of the City contains most of Miami Beach's low and moderate-income residents. The area is primarily residential, although portions comprise the principal

commercial sectors for businesses that serve the lower income neighborhoods. The area includes census tracts 39.01, 30.02, 39.05 and 39.06, which are target areas for the Community Development Block Grant (CDBG) program. These census tracts have a density ranging from 53% low/moderate income to 97.5% low/moderate income persons.

The North Beach is a culturally and economically diverse community. While there are both agency and human resources within the community, the area's history of disenfranchisement and weak community structure has created service and communication gaps. As a result, many residents needing services are not aware of existing resources or may be too isolated to be properly reached via conventional outreach efforts. This problem is further amplified by the immigrant status of much of the population. A significant number of residents in the area lack proper immigration documentation. This lack of legal "status" further impedes community cohesiveness and access to resources.

- **COMMUNITY CONSULTATION**

This strategy was developed by the City of Miami Beach, based on the City of Miami Beach North Beach Strategic Plan, and on the City of Miami Beach Neighborhoods First Comprehensive Plan, both of which were prepared through intensive consultation processes with members of the community, including:

- residents in the area
- owners/operators of businesses in the area
- local financial institutions; and
- community groups

Methods used by the City of Miami Beach to provide outreach to the types of groups noted above included: community workshops, public hearings and consultations sponsored by the City of Miami Beach through the efforts of the Planning and Zoning Department and the Community/Economic Development Department.

Additionally, the process for risk assessment for the North Beach was systematic. In the case of the Neighborhoods First citizen Oversight Committee and used in the preparation of the Comprehensive Plan. It began with the collection of data for the 19 risk factors on the local, state and national level. When possible, local data was then reviewed within a comparative context against county, state and national statistics. However, the absence of truly localized data relegated most of the review to state and national statistics.

In addition to a numerical review of the statistics, the Oversight Committee utilized the Communities That Care Problem Behavior Matrix to understand the relationship between risk factors and problem behavior. Additionally, the Oversight Committee placed emphasis on the need to address problem behavior and risk factors by focusing resources on prevention -- rather than intervention -- efforts.

While the Oversight Committee recognized that the target area suffers from the effects of multiple risk factors and problem behaviors, the decision was made to take a directed stance and prioritize only three risk factors upon which to focus comprehensive plan efforts. Because so many risk factors and problem behaviors are prevalent within the target area, there was debate as to which three risk factors would receive the greatest attention. The Committee considered the following criteria in selecting prioritized risk factors:

- The availability of data that allows for a clearly established benchmark and the subsequent review of progress;
- The ability of the Committee to have access to the systems that influence the risk factor (The school system was avoided in the program plan because the Committee felt it could not wield any substantial influence over such a closed and heavily bureaucratic organization.); and
- Public response as demonstrated through public comments at Neighborhoods First community meetings and workshops.

As the risk assessment process progressed, the Committee felt that academic failure in elementary school was a significant contributing factor influencing juvenile delinquency in our community. However, because the school district is an independent entity with little outside influence, the Committee felt it would be unable to effectively influence change on this risk factor within the comprehensive plan's timeframe. While this risk factor is not prioritized for these reasons, the City of Miami Beach Office of Children's Affairs will be working to unite the Parent Teacher Associations within the feeder pattern to create a more vocal and influential advocacy group to effect change within the feeder pattern's public schools. Clearly, it is the Committee's stance that change must happen within the community's public schools to reduce academic failure among youth.

It should be noted that the Committee's membership expressed individual support for the following risk factors:

- Availability of drugs
- Availability of firearms
- Transitions and mobility
- Low neighborhood attachment
- Extreme economic deprivation
- Family management problems
- Family history of problem behavior
- Family conflict
- Early/ persistent anti-social behavior
- Academic failure
- Lack of commitment to school
- Alienation/ rebelliousness
- Friends who engage in problem behavior
- Favorable attitudes toward problem behavior

- Early initiation of problem behavior

In addition, the needs and concerns of the consulted parties were incorporated into the Strategy in the following manner: Specific input was received and presented back to the community in the form of the City of Miami Beach North Beach Strategic Plan. In the case of the Neighborhoods First Initiative, the City of Miami Beach presented its Comprehensive Plan to the Florida Department of Juvenile Justice, its citizen Oversight Committee, and the community at large.

- **ASSESSMENT**

- A. Economic Conditions

The City of Miami Beach has implemented many important economic initiatives that affect the North Beach community. In aggregate, approximately \$120 million of public improvements have been, or are being performed in North Beach. This public investment, coupled with the significant private investments that are under development are vital as part of a successful revitalization strategy.

Many parts of the North Beach area are included in a State-designated Enterprise Zone, including all of the commercial areas and portions of the residential neighborhoods.

- B. Opportunities for economic development improvement

As described in the City of Miami Beach's Five-Year Consolidated Plan, the major objective of the City's economic development activity is to stimulate economic revitalization and job creation in the City by facilitating business development and expansion, job creation/retention, encouraging private development through public support, and carrying out housing and neighborhood revitalization. The development of convention-quality hotels is an economic development objective, which is an example of business development that provides significant employment opportunities for people entering the job market. The City of Miami Beach North Beach Revitalization Plan identifies eight strategic recommendations as main areas of opportunity for improvements, as follows:

- Public Investment in the North Beach Neighborhoods
 - Training and Education
 - Family Activity Development
 - Protect and Enhance the Neighborhood Scale and Character
 - Business Development
 - 72nd Street Site
 - Residential Investment
 - Parking and Transportation
 - Marketing

Within each area of opportunity, specific strategies are recommended, detailing specific goals and objectives. Please refer to pages the appropriate section for more details.

C. Problems that the community is likely to face

After several weeks of discussion and review, the following four risk factors were prioritized by the Neighborhoods First Oversight Committee for action:

- Low neighborhood attachment and community disorganization;
- Academic failure in elementary school;
- Family management problems; and
- Early initiation of problem behavior.

While the Committee clearly agreed that there are much more than three risk factors, which require attention, they recognized the limitations of time and resources. The selection of the three risk factors above was heavily influenced by the overlapping nature of the risk factors and the potential to create strategies that would influence them collectively. Furthermore, progress made on these three risk factors is seen as a foundation upon which future delinquency prevention efforts can be made.

Low neighborhood attachment & community disorganization, which is seen as vital to the overall effort to effectively address juvenile delinquency, was selected as a priority because of the area's structure. Poor community leadership and resident disenfranchisement are seen as major obstacles to the overall prevention effort. While risk factor data was limited for the target zone, the Oversight Committee's decision was influenced by individual members' experiences within the North Beach area and the progress data of the Neighborhoods First Support Team. During the comprehensive plan process, the siting of a Primary Learning Center (PLC) to serve the target area amplified the division between area residents. Public meetings to discuss the siting of the PLC became "us" versus "them" despite the proximity of these neighbors. These events drew attention to the area's weak leadership and fractured community structure at a time when the community should have unified and celebrated such a needed addition.

Additionally, the Neighborhoods First Support Team has been conducting door-to-door outreach in the target area since February 1999. These efforts have uncovered the isolation of individual residents who often have limited, if any, interaction with other neighborhood residents. More so, these same residents (who tend to be poor, immigrant and in need of services) are not aware of community resources. The feedback consistently received by the Support Team is the surprise many residents express at receiving the Community Resource Guide that lists community resources including legal, medical and social services. Despite the presence of multiple media sources serving the area, the information regarding available resources has not effectively reached those most in need: target area residents.

Community participation in neighborhood associations and Parent Teacher Associations is scarce. Neighborhoods First staff members have attended some public meetings with only one attendee aside from themselves. While PTA membership is low throughout much of the feeder pattern, Biscayne Elementary School's PTA has been dependent on the extraordinary efforts of a handful of parents as its membership falls far short of the school's student enrollment and potential.

With respect to low neighborhood attachment and community disorganization, an evaluation of area resources noted the absence of cohesive collaboration among service providers to communicate the availability of community services to residents. While individual providers may have outreach plans in place, their efforts were isolated and focused on their own agency's agenda. As a result, these agencies were duplicating efforts while limiting the impact of the outreach itself.

Secondly, much of the area's population lives in isolation. Traditional methods of community communication (such as local media, community centers, etc.) have been ineffective in reaching those most in need of services. Language and cultural obstacles further complicate this task. Unfortunately, when present, conventional communication resources are not forwarding information regarding community services.

A concern in the selection of low neighborhood attachment and community disorganization as a prioritized risk factor was the unit utilized to measure progress. While not the most effective or appropriate measure, resident voting trends will be used to gauge progress for this risk factor. It is hoped that as information becomes available, the community will become empowered and this empowerment will manifest itself in greater voter participation, as this is the traditional act of civic involvement.

Family management problems were selected as a prioritized factor for several reasons. The presence of domestic violence and poor family structure has become folklore in the target area. The focus three years ago on affordable housing in the area further amplified this public conception, as the debate on affordable housing opportunities became a debate on family values and cultural differences. The fact that the residents within the area tend to be poor (as the median household income trails county and state averages) further polarized the debate between the "haves" and "have nots."

The data for the area reflects instability (high mobility rate), poverty (families unable to successfully fend for themselves), poor family structures (divorce follows the national trend), and an expressed concern by the Florida Department of Children & Families that the North Beach community is an area of concern. The North Beach area is still in the midst of transition as economic forces in the south, and redevelopment efforts in the area are displacing low- and moderate-income families that are unable to absorb rent increases.

While the North Beach community has many residents in public-assisted housing and receiving other public entitlements, there are many families that have been identified as

in need of aid who cannot access help because of their immigration status. This problem has been most readily quantified via the Neighborhoods First efforts. Neighborhoods First staff often encounter residents lacking formal legal status who are in need of rent assistance, medical care and employment. Unfortunately, there is little, if any, help for these residents. Most agencies offering legal help with immigration issues are currently not accepting any additional referrals because they are overwhelmed and lack resources. The high mobility rate within the area is further amplified by the immigration issue as families dependent on cash employment (since they lack Social Security numbers) find it more difficult to sustain employment and, therefore, are more likely to move more frequently.

The family is seen as the community's first line of defense in preventing and responding to problem behaviors. If the families in the target area are ill equipped to respond, they will fail. If families fail, the community as a whole will fail as well. As a result of this methodology, family management problems were selected as a priority. Furthermore, addressing family management problems would enable the Committee to indirectly address issues such as attitudes towards problem behavior and favorable parental attitudes towards and involvement in problem behavior.

Early initiation of problem behavior was selected because the likelihood of Continued engagement in problem behavior is amplified if the behavior begins when the offender is young. More to the point, if youth are success-Fully taught not to engage in problem behavior, they won't. Fewer resources are needed to prevent problem behaviors than are needed for intervention.

Furthermore, the explosive growth of the City's youth population in the last 15 years has resulted in a noticeable service gap. The City had historically been home to the elderly and seasonal visitors. The City's infrastructure was not prepared for such a rapid demographic change. As a result, recreational Programming was slow in developing and today remains short of what is needed. This is especially noticed, as most of the City's parks do not have Lighting and must therefore close at sunset. That means our community's Youth must find alternative places to "hang out" during the critical time after Sunset and before they are expected home for dinner. As national statistics have shown, this is a critical time for juvenile delinquency as it creates a Period free of supervision.

The community's inability to provide adequate alternative programming and the failure of some prevention programs to address the issues at a developmentally appropriate time were seen as contributing factors in the selection of early initiation of problem behavior.

- **ECONOMIC EMPOWERMENT**

- A. Plans to develop the selected neighborhood
- B. Activities that will be undertaken to create meaningful jobs for unemployed LMI residents of the area
- C. Plan to promote revitalization of the neighborhood

- **PERFORMANCE MEASURES**

- A. Goals and anticipated results for the implementation of the plan

The following strategies and their corresponding goals will be implemented:

- Continue the investment in the City's Infrastructure
- Improvement of Public Facilities and Neighborhood Assets
- Explore Expansion Opportunities for the Existing North Beach Library
- Continually improve the public and private school infrastructure.
- Develop a "Higher Education Center" with Programs from Multiple Institutions
- Develop New Activities and Attractions
- Adopt Architectural Districts or Historic Districts with Design Guidelines
- Implementation of a Business Retention, Expansion and Recruitment Program
- Redevelopment of 71st Street into the Central Business District (CBD) of North Beach
- Increase Availability of Incentive Programs
- Attract and Support Cultural Arts Activities as an Additional Catalyst to Downtown Revitalization
- Capitalize on the linkage opportunities from the 72nd Street Site.
- Improve the Conditions of the Historic Building Stock
- Expand and Target Housing Programs and Assistance
- Conduct an Area-Wide Parking Study Focused on Commercial Area Needs
- Improve Parking and Transportation Opportunities
- Development of A Transit Link Between the CBD and the Fountain
- Capitalize on the Area's Assets
- Implement Targeted Marketing Programs to Potential North Beach Residents
- Increase and Expand Targeted Marketing to Customers
- Implement Targeted Marketing Programs to Potential Commercial and Residential Investors and Developers

B. Benchmarks

Strategic Recommendation: Public Investment in the North Beach Neighborhoods

- Strategy 1 - Continue the Investment in the City's Infrastructure

Benchmarks:

- Upgrade and enhance streetscapes
 - Upgrade and enhance drainage, water and sewer systems
- Strategy 2 - Improvement of Public Facilities and Neighborhood Assets

Benchmarks:

- Renovate and upgrade the area's parks
 - Complete the construction of the North Beach Youth Center
 - Enhance available recreation programs
 - Invest in enhancing the area's Fire Station
 - Continue beach renourishment efforts
 - Clean the canals and shoreline of inland waterways
 - Provide public access improvements to the shoreline at all street ends
 - Complete the renovation of the Shane Watersports Center
 - Renovation/Redesign of Normandy Shores Golf Course
- Strategy 3 - Explore Expansion Opportunities for the Existing North Beach Library

Benchmarks:

- Ongoing

Strategic Recommendation: Training and Education

- Strategy 4 - Continually improve the public and private school infrastructure.

Benchmarks:

- Ongoing

- Strategy 5 - Develop a "Higher Education Center" with Programs from Multiple Institutions

Benchmarks:

- Offer programs with high-level job skills in technology, media, hospitality and cultural arts

Strategic Recommendation: Family Activity Development

- Strategy 6 - Develop New Activities and Attractions

Benchmarks:

- Construct the North Beach Recreational Corridor
- Provide boating access to inland waterways
- Construct interactive waterplay fountains in beachfront parks
- Develop and program a nature center in North Shore Open Space Park
- Explore museum opportunities

Strategic Recommendation: Protect and Enhance the Neighborhood Scale and Character

- Strategy 7 - Adopt Architectural Districts or Historic Districts with Design Guidelines

Benchmarks:

- Specifically adopt development standards and design guidelines for the Altos del Mar Historic District
- Specifically adopt development standards and design guidelines for the eight City-owned parking lots.

Strategic Recommendation: Business Development

- Strategy 8 - Implementation of a Business Retention, Expansion and Recruitment Program

Benchmarks:

- Identify a hierarchy of commercial districts and differentiate functions
 - Identify Business Recruitment Targets for the various commercial districts.
 - Attract a quality supermarket to the Normandy Isle area.
 - Implement a business apprenticeship program to retain viable businesses whose owners are close to retirement.
- Strategy 9 - Redevelopment of 71st Street into the Central Business District (CBD) of North Beach

Benchmarks:

- Promote land assembly, redevelopment and infill.
- Target initial development activity in the eastern blocks, with future expansion westward to Indian Creek.
- Expand CD zoning to the north and south.
- Require active commercial use on 71st Street frontage.
- Explore the viability of mixed-use development opportunities.
- Create design guidelines for the CBD.

- Strategy 10 - Increase Availability of Incentive Programs

Benchmarks:

- Target the façade improvement program to assist selected types of businesses and locations.
 - Expand the use of Enterprise Zone benefits.
- Strategy 11 - Attract and Support Cultural Arts Activities as an Additional Catalyst to Downtown Revitalization

Benchmarks:

- Purchase and renovate the Byron Carlyle Theater as a center for Cultural Arts activities.
- Strategically position Cultural Arts parking needs such that they provide overflow benefits to the neighboring businesses.
- Encourage higher education sponsorship of arts activities.
- Seek additional Cultural Arts space.
- Turn the bandshell into a viable performance venue with targeted performance planning.
- Explore opportunities for museum development

Strategic Recommendation: 72nd Street Site

- Strategy 12 - Capitalize on the linkage opportunities from the 72nd Street Site.

Benchmarks:

- Enhance the relationship between North Shore Park and the 72nd Street Site as the "Town Commons" of North Beach.
- Promote Cultural and educational activity.

Strategic Recommendation: Residential Investment

- Strategy 13 - Improve the Conditions of the Historic Building Stock

Benchmarks:

- Incentives to increase unit size.
- Historic preservation tax credits.
- Utilize private sources of financing with greater flexibility.
- Increase availability of rehab loans.
- Eliminate substandard-size units.
- Equal maintenance standards for occupied and vacant buildings.
- Concentrate enforcement efforts in small areas.

- Strategy 14 - Expand and Target Housing Programs and Assistance

Benchmarks:

- Remove Section 8 subsidy from problem landlords.
- Increase availability of homeownership loans.

Strategic Recommendation: Parking and Transportation

- Strategy 15 - Conduct an Area-Wide Parking Study Focused on Commercial Area Needs

Benchmarks:

- Identify existing and future parking needs
- Develop a plan for expanding public parking opportunities.
- Utilize public parking supply as an incentive to private infill development in strategic locations.

- Strategy 16 - Improve Parking and Transportation Opportunities

Benchmarks:

- Discourage through traffic and speeding on residential streets.
- Analyze feasibility of reducing lanes and/or restoring two-way traffic on arterial streets.
- Enhance Residential Parking.

- Strategy 17 - Development of A Transit Link Between the CBD and the Fountain

Benchmarks:

- Ongoing

Strategic Recommendation: Marketing

- Strategy 18 - Capitalize on the Area's Assets

Benchmarks:

- Promote unique MIMO Architecture.
- Promote natural assets.
- Promote activities and attractions.
- Promote the cultural arts.
- Promote the quieter, slower pace than South Beach.

- Strategy 19 - Implement Targeted Marketing Programs to Potential North Beach Residents

Benchmarks:

- Promote Neighborhoods on a Regional and National Level.
- Strategy 20 - Increase and Expand Targeted Marketing to Customers

Benchmarks:

- Sponsor special events that relate to clustered activity.
- Organize advertising cooperatives or Business Improvement Districts.
- Strategy 21 - Implement Targeted Marketing Programs to Potential Commercial and Residential Investors and Developers

Benchmarks:

- Capitalize on new and existing institutional commitments to the area.
- Promote commercial infill and redevelopment of existing buildings, beginning with strategically linked locations.
- Promote the benefits of rehabilitating the existing housing stock.
- Promote new infill housing on vacant lots.

- **STRATEGY AREA FUNDING**

The City of Miami Beach will describe the HUD formula program resources that will be addressed toward the strategy area in subsequent Action Plan submissions to HUD.

The City intends to utilize its non-housing directed CDBG dollars in support of its ongoing "*Neighborhoods First*" initiative and to provide needed public improvements within its low-income areas. At the time of the preparation of the Consolidated Plan, "*Neighborhoods First*" was in its initial stages. Many of the public works projects, such as the street or commercial façade improvement projects occur in the North Beach section of the City, which contains higher percentages of lower-income residents.

- **HUD REVIEW, APPROVAL AND MONITORING**

This Strategy will be submitted to the U.S. Department of Housing and Urban Development (HUD), under the following timeline:

June 1 to June 30, 2001	Thirty-Day Comment Period for Public Review and Comment regarding the Proposed Strategy.
July 18, 2001	Proposed Strategy is presented to the City of Miami Beach City Commission
July 18, 2001	Submission of Strategy to HUD, subject to HUD approval.

August 2001	Submission of One-Year Action Plan for Fiscal Year 2001-2002, including activities under this Strategy, pending approval from HUD.
October 1, 2001	Implementation of Strategy, submission of first requests for drawdowns. Approval from HUD for drawdown requests.

Eligibility of the Project Under CDBG Regulations - The proposed activities meet the primary Community Development Block Grant (CDBG) objective of developing viable urban communities, by providing ...a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income, as described in section 101 (c) of the Housing and Community Development Act of 1974, as amended, and the National Objective of Area Benefit to low and moderate-income persons at 570.208 (a) (1) (I).

Statutory National Objective Compliance - The City has determined that any activities to be undertaken under the proposed strategy will meet the regulations at 24 CFR 570.208 (a) (1) (I).

24 CFR 570.208 indicates the criteria used to determine whether a CDBG-assisted activity complies with one or more of the national objectives as required under 24 CFR 570.200 (a) (2).

"The following criteria shall be used to determine whether a CDBG-assisted activity complies with one or more of the national objectives as required under 570.200(a) (2): (a) Activities benefiting low- and moderate-income persons. Activities meeting the criteria in paragraph (a) (1), (2), (3), or (4) of this section, as applicable, will be considered to benefit low and moderate-income persons unless there is substantial evidence to the contrary. In assessing any such evidence, the full range of direct effects of the assisted activity will be considered. (The recipient shall appropriately ensure that activities that meet these criteria do not benefit moderate-income persons to the exclusion of low-income persons.)

Area benefit activities. (I) An activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low and moderate-income persons. Such an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion."

Monitoring of the various activities described in the Strategy will be a continuous and ongoing process. To ensure that planning will continuously reflect the successes and lessons learned from previous activities, the City will monitor the effectiveness of its programs and initiatives, and prepare reports for submission to the U.S. Department of Housing and Urban Development as required by the program regulations.

The City will enter into binding subrecipient contract agreements with organizations receiving federal funds. These agreements will provide a basis for enforcing the goals and objectives of the Consolidated Plan, the Action Plan, the federal rules and regulations, and the time frame to achieve the stated accomplishments. The agreements contain remedies in the event of a breach of the provisions by the subrecipient parties.

The overriding goal of monitoring is to ensure that services are provided as prescribed in the subrecipient contract, and to identify deficiencies and remedial actions. The emphasis is on prevention, detection and correction of problems. Toward this end, all monthly and quarterly reports submitted by the subrecipients are thoroughly examined to ensure compliance. Furthermore, on-site technical assistance visits and monitoring visits are performed throughout the program year.

Communication is the key to a good working relationship with the subrecipient agencies. Monitoring is an ongoing process involving continuous subrecipient communication and evaluation. The staff of the Community/Economic Development Department is experienced in subrecipient monitoring criteria and techniques.

- **AMENDING THE STRATEGY**

When amending this Strategy, the City of Miami Beach will follow the procedures outlined in its approved Citizen Participation Plan. Citizens will have a reasonable opportunity to comment on the original strategy and any proposed substantial amendments thereto. Additionally, the Strategy will be made available to the public at the City Clerk's Office and, upon request, will be made available in a format accessible to persons with disabilities. A reasonable number of free copies of the Strategy will be also available in the Community/Economic Development Department.